

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**SUIZA DAIRY CORP.’S MOTION FOR LEAVE TO CITE SPANISH LANGUAGE
DOCUMENT AND FOR EXTENSION OF TIME TO FILE A CERTIFIED
TRANSLATION**

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE LAURA TAYLOR
SWAIN:**

COMES NOW, creditor Suiza Dairy Corp. (“Suiza”), represented by the undersigned attorneys, and very respectfully hereby submits this motion requesting the entry of an order, substantially in the form of Exhibit A hereto (the “Proposed Order”), granting Suiza leave to cite Spanish-language document in connection with the Joint Status Report (as defined below) being

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

filed today and an extension of time to file certified English-language translation, and in support thereof.

1. Today, the Commonwealth of Puerto Rico and Suiza filed a Joint Status Report In Connection with Suiza's Urgent Motion Requesting Comfort Order [D.E.15862] (the "Joint Motion").

2. In support of the arguments raised by Suiza in the Joint Motion, Suiza cited Administrative Order 2020-34 ("Administrative Order") issued by Mr. Jorge A. Campos Merced ("Campos Merced"), as Administrator of the Office of Regulation of the Milk Industry (Spanish acronym "ORIL").

3. Due to time constraints, despite diligent efforts, Suiza was unable to obtain a certified English-language translation of the Spanish-Language documents prior to today's filing.

4. Accordingly, Suiza seeks leave from this Court to rely on the Spanish-Language documents in their original Spanish language and requests an extension of 15 days, to and including March 5, 2021, to file a certified English-language translation of the same pursuant to Local District Court Rule 5(g).

WHEREFORE, Suiza respectfully requests the Court enter the Proposed Order, attached hereto as Exhibit A, permitting it to file the Spanish-Language documents in their original Spanish language, granting it until March 5, 2021 to submit a certified English-language translation of the same, and granting such other and further relief as is just and proper.

RESPECTFULLY SUBMITTED.

Dated: February 18, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on February 18, 2021, I filed the instant motion through the Court's CM/ECF system, which will send notification of such filing to all CM/ECF participants, in compliance with the case management order in the case.

/s/Alana M. Vizcarrondo-Santana

Exhibit A
Proposed Order

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors.²

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**[PROPOSED] ORDER ON MOTION OF SUIZA DAIRY FOR LEAVE TO CITE A
SPANISH LANGUAGE ADMINISTRATIVE ORDER AND FOR EXTENSION OF TIME
TO FILE A CERTIFIED TRANSLATION**

Upon consideration of Suiza Dairy's Motion for Leave to Cite A Spanish Language Administrative Order and for Extension of Time to File a Certified Translation (the "Motion"), filed by Creditor-Movant Suiza Dairy Corporation ("Suiza Dairy"), and for an order Suiza Dairy for leave to cite a Spanish-language version of Administrative Order 2020-34 (the "Administrative Order") and an extension of 15 days, to and including March 5, 2021, to file certified English-language translation of the Administrative Order, as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and notice of the Motion being adequate and proper under the circumstances, and no other or further notice being required; and finding good cause for the requested relief, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. Suiza Dairy is permitted to cite the Spanish-language version of the Administrative Order 2020-34.

² The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

3. Suiza Dairy's certified English-language translation of the Administrative Order shall be due on or before March 5, 2021.
4. The Court retains exclusive jurisdiction to hear and determine any and all disputes related to or arising from the implementation, interpretation and enforcement of this Order.

Dated: _____

UNITED STATES DISTRICT JUDGE